

### **REMARKS**

Favorable reconsideration and allowance of the present application are respectfully requested in view of the foregoing amendments and the following remarks.

Claims 20-29 and 31-38, including independent claims 20 and 31, remain pending in the present application. Independent claim 20, for example, is directed to a composite fabric comprising a creped nonwoven web. The nonwoven web is formed from continuous splittable multicomponent thermoplastic fibers having individual segments exposed on an outer perimeter thereof. Various segments of these fibers may thus separate from the web during entanglement, thereby improving the bulk, softness, and capillary tension of the resulting fabric. (Appl. p. 9). The nonwoven web is also creped. Creping the nonwoven web may open its pore structure, thereby increasing its permeability. Moreover, creping may also enhance the stretchability of the web in the machine and/or cross-machine directions, as well as increase its softness and bulk. (Appl. p. 14).

In addition, the aforementioned nonwoven web is hydraulically entangled with a fibrous material that constitutes greater than about 50% by weight of the fabric, and in some embodiments, from about 60% to about 90% by weight of the fabric. The fibrous material contains cellulosic fibers (e.g., pulp fibers), which as a result of hydraulic entanglement, are driven into the nonwoven web. (See e.g., Appl. pg. 22).

In the Office Action, independent claims 20 and 31 were rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,375,889 to Holmes, et al. in view of U.S. Patent Application Publication No. 2002/0034907 to Groitzsch, et al. Holmes, et al. is directed to a compacted nonwoven fabric having a basis weight of

about 1-5 ounces per square yard. The fabric preferably comprises 50-100% polyester fibers, with the remaining fibers (if any) comprising rayon, cotton, bicomponent fibers, and the like. The most preferred fabrics contain in excess of 75% polyester fibers, such as poly(ethylene terephthalate). As shown in Fig. 1, a web of loose fibers 2 is first produced by a series of cards or any other known equipment capable of producing an unbound web of fibers. The web 2 is entangled with water jets 10 to form a coherent, durable nonwoven web 12. The uncompacted web is then microcreped with apparatus 20. (Col 2, ll. 6-54).

As correctly noted by the Examiner, however, Holmes, et al. fails to disclose certain aspects of independent claims 20 and 31. For instance, Holmes, et al. does not teach that the fibers used to form the nonwoven web are splittable, multicomponent thermoplastic fibers. Nevertheless, in the Office Action, Groitzsch, et al. was cited in combination with Holmes, et al. in an attempt to render obvious independent claims 20 and 31. In particular, it was stated that Groitzsch, et al. teaches splittable, multicomponent thermoplastic fibers, and that it would have been obvious for one of ordinary skill in the art to incorporate such fibers into the nonwoven fabric of Holmes, et al.

Applicants initially note that one of ordinary skill in the art would not have found it obvious to modify Holmes, et al. in the manner suggested in the Office Action. For example, as stated above, the fabric of Holmes, et al. is formed from a web of loose fibers that is hydraulically entangled to form a coherent structure. The loose fibers used to form the web are staple fibers. (See e.g., Col. 3, l. 3 and Col. 4, l. 4). To the contrary, independent claims 20 and 31 each requires the use of continuous fibers (or

filaments), such as spunbonded fibers. One of ordinary skill in the art would simply not have found it obvious to substitute continuous splittable multicomponent fibers for the fibers of Holmes, et al., regardless of the teachings of Groitzsch, et al.

Nevertheless, even if the references are somehow combinable, Applicants respectfully submit that the resulting combination would still fail to disclose one or more aspects of independent claims 20 and 31. For example, as stated, independent claim 20 is directed to a composite fabric containing a fibrous material hydraulically entangled with a creped nonwoven web. The fibrous material constitutes at least about 50% by weight of the fabric and contains cellulosic fibers (e.g., pulp fibers) that are driven into the nonwoven web.

Neither Holmes, et al. nor Groitzsch, et al. discloses the above-referenced limitations. For instance, to the extent even present in Holmes, et al., cellulosic fibers are not driven into a nonwoven web as a result of hydraulic entanglement, but are instead simply part of the blend used to form an unbonded web of loose fibers prior to entanglement. (Col. 2, ll. 6-54). Likewise, the failure of Groitzsch, et al. to disclose the above-referenced limitations is perhaps best illustrated in Examples 1-4. (pp. 4-5). In Examples 1-2, for instance, a carded staple fiber pile is formed from 60% viscose staple fibers and 40% polyester fibers, and then hydraulically entangled on each side. A textured polyester multifilament yarn is then shot through, in the warp direction, the hydraulically entangled nonwoven fabric. (pgs. 4-5). In Example 3, the carded staple fiber pile of Examples 1-2 is substituted with 100% viscose staple fibers. (pg. 5). Finally, in Example 4, a non-bonded endless filament (polyamide/polyester) nonwoven fabric is first formed. The non-bonded web is then hydraulically entangled and shot

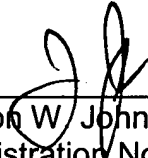
through with polyester yarns. Accordingly, as evidenced by these examples of Groitzsch, et al., cellulosic fibers are simply not driven into a nonwoven web as a result of hydraulic entanglement as required by independent claims 20 and 31.

Thus, for at least the reasons set forth above, Applicants respectfully submit that independent claims 20 and 31 patentably define over the cited references, taken singularly or in any proper combination. In addition, the above-cited references were also cited to reject dependent claims 21-29 and 32-34. Applicants respectfully submit, however, that at least for the reasons indicated above relating to corresponding independent claims 20 and 31, claims 21-29 and 32-34 patentably define over the references cited. However, Applicants also note that the patentability of dependent claims 21-29 and 32-34 does not necessarily hinge on the patentability of independent claims 20 and 31. In particular, some or all of these claims may possess features that are independently patentable, regardless of the patentability of claims 20 and 31.

It is believed that the present application is in complete condition for allowance and favorable action is respectfully requested. Examiner Pratt is invited and encouraged to telephone the undersigned, however, should any issues remain after consideration of this Amendment. Please charge any fees required by this Amendment to Deposit Account No. 04-1403.

Respectfully submitted,

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